

**FACT SHEET FOR STATE WASTE DISCHARGE
PERMIT NO. ST-9054**

COVENTRY VALE WINERY

SUMMARY

Coventry Vale Winery is a custom winemaking facility located approximately eight miles northeast of Grandview, in Benton County. It is one of the largest wineries in the State of Washington. It produces wines and wine grape juices on a contract basis for other wineries throughout the United States as well as in Canada, Europe and Japan. Coventry Vale wastewater is discharged to evaporation ponds.

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INTRODUCTION

This fact sheet is a companion document to the draft State Waste Discharge Permit No. ST-9054. The Department of Ecology (the Department) is proposing to issue this permit, which will allow discharge of wastewater to waters of the State of Washington (State). This fact sheet explains the nature of the discharge, the Department's decisions on limiting the pollutants in the wastewater, and the regulatory and technical bases for those decisions.

Washington State law (RCW 90.48.080 and 90.48.162) requires that a permit be issued before discharge of wastewater to waters of the State is allowed. Regulations adopted by the State include procedures for issuing permits (Chapter 173-216 WAC), and water quality criteria for ground waters (Chapter 173-200 WAC). They also establish requirements which are to be included in the permit.

This fact sheet and draft permit are available for review by interested persons as described in Appendix A--Public Involvement Information.

The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in these reviews have been corrected before going to public notice. After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties submitting comments will receive a copy of the Department's response. The fact sheet will not be revised. Changes to the permit will be addressed in Appendix C--Response to Comments.

GENERAL INFORMATION	
Applicant	Coventry Vale Winery
Facility Name and Address	Coventry Vale Winery Facility Location: 160602 W. Evans Road Benton County Mail Address: PO Box 249 Grandview, WA 98930
Type of Facility	Winery
Type of Treatment:	Evaporation ponds with aeration
Discharge Location	Latitude: 46° 16' 22" N Longitude: 119° 49' 41" W; Near intersection of Wilgus Rd. and Hanks Rd.; West ½ of NW Quarter of Section 16, T9N, R24E, WM.
Contact at Facility	Name: Juergen Grieb Telephone #: 509-882-4100
Responsible Official	Name: Juergen Grieb Title: Vice President Address: PO Box 249 Grandview, WA 98930-0249 Telephone #: 509-882-4100 FAX # 509-882-1852

BACKGROUND INFORMATION

DESCRIPTION OF THE FACILITY

History

The Coventry Vale Winery began operation in 1982 at the current location, approximately 8 miles northeast of Grandview, WA. The facility had a bottling operation until 1987, at which time the bottling equipment was sold. Presently, the facility makes wine on a contract basis for other wineries.

In 1997 the company began an expansion program that tripled its production capacity. The increased production capacity resulted in an overtaxed wastewater treatment lagoon. As a result,

the company constructed two new effluent storage/evaporation ponds in 2001 to handle the increase in process wastewater.

Industrial Processes

The firm operates 41 weeks per year, 5 days per week, 8 hours per day producing wine and grape juice during normal operation. During the grape harvest season, which lasts for 11 weeks, the plant is in production 7 days a week, 24 hours a day.

The wine-making process water (as well as the facility's domestic water) is obtained from a private well. The water right certificate for this well is G4-28907C. Grapes are dumped into one of two outside receiving bins, located on the north side of the facility complex. The washing and crushing/pressing process machinery is also located outside, near the grape receiving bins. The crushed grapes are screened to remove most of the mass of grape skins, stems, seeds and pulp (termed pomace). The pomace is used as mulch between rows of grape vines for ground cover and dust control. Coventry Vale has a Solid Waste Management Plan and is permitted through the Benton/Franklin Health District.

The raw grape juice is transferred to one of several fermentation vats. After fermentation has run its course, the dead yeast cells, or the lees, settle to the bottom of the vats. Coventry Vale has a lees filtration system. Therefore, most of the lees produced during fermentation are not a constituent of the effluent. The total annual volume of lees filtered out is estimated to fill about two waste dumpsters.

Sixty percent of the facility's annual effluent production occurs during the 3 month grape harvest/crush period each fall. Tank cleaning contributes approximately 70% of the flow, while filtration of the lees provides 10 to 20%, and crushing/pressing contributes less than 10% of the annual effluent flow. During maximum production, the average effluent flow is projected to be as much as 100,000 gallons per day in October.

The total volume of the storage and fermentation tanks at the facility is about 2.7 million gallons. Caustic soda, bleach, and citric acid are the usual chemicals employed in cleaning these tanks.

Treatment Processes

Approximately one-half the effluent's volume is routed into an underground 20,000 gallon capacity settling tank located in the southwest corner of the facility grounds, prior to discharge to the evaporation ponds. The settling tank effectively acts as a septic tank, allowing for digestion of settled solids by bacteria. The other half of the effluent bypasses the settling tank and is routed directly into the PVC discharge pipe and then south one mile to the lift station and evaporation ponds.

The PVC effluent pipe discharges into a small, unlined settling/aeration basin, with a storage capacity of approximately 33,400 cubic feet. From the unlined basin, the effluent flows into a lift station tank where it is pumped beneath Hanks Road into one of two new evaporation/aeration basins. The basins were constructed in 2001, and are located approximately ¼ mile to the east of the original small basin. The new evaporation ponds are each provided with a single 20 mil, PVC liner. There is no installed leak detection system.

The west evaporation basin has an capacity of approximately 289,000 cubic feet. The east evaporation basin has a capacity of approximately 649,000 cubic feet. At the time this permit was being developed, the west basin received the effluent and had two aerators operating. The east basin was functioning as an overflow basin. The west basin's aerators provide the oxygen necessary to treat the biological oxygen demand of the effluent, providing secondary treatment. The aeration will also serve to mitigate odors and increase evaporation rates. The two new basins are projected to have sufficient capacity to allow for complete evaporation of the yearly effluent discharge, provided normal climatic conditions.

PERMIT STATUS

This facility has previously had only a temporary state wastewater discharge permit. An application for a permit was originally submitted to the Department on February 16, 1993 and accepted by the Department on June 10, 1993, at which time it received a temporary State Discharge Permit No. ST-9054.

A second temporary state waste discharge permit was issued on August 20, 1998 from an application which was submitted to the Department on July 2, 1998 and accepted by the Department on July 14, 1998.

WASTEWATER CHARACTERIZATION

Wastewater discharged to the Permittee's evaporation ponds is characterized for the following parameters, from sampling conducted from September through November of 2002.

Table 1: Wastewater Characterization from Pump Lift Station

Parameter	Average Concentration
BOD (5 day)	22,004 mg/L
TSS	6,548 mg/L
Total Kjeldahl N	376 mg/L
Parameter	Average
Ph	4.04 standard units
Temperature	9.8 ° C

Table 2: Wastewater Characterization from New Evaporation Pond

Parameter	Average Concentration
Total Dissolved Solids	3,233 mg/L
Fixed Dissolved Solids	1,183 mg/L
Sulfate	37.6 mg/L
Chloride	63.6 mg/L

SEPA COMPLIANCE

Benton Country Planning Department issued a determination of non-significance for the evaporation ponds construction on April 17, 2001 (File no. EA 01-22).

PROPOSED PERMIT LIMITATIONS

State regulations require that limitations set forth in a waste discharge permit must be either technology- or water quality-based. Wastewater must be treated using *all known, available, and reasonable methods of prevention, control, and treatment* (AKART) and not pollute the waters of the State. The minimum requirements to demonstrate compliance with the AKART standard are to be determined in an Engineering Report detailing the performance standards of the evaporation ponds. The Engineering Report shall be in conformance with WAC 173-240-130.

The more stringent of the water quality-based or technology-based limits are applied to each of the parameters of concern. Each of these types of limits is described in more detail below.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS

All waste discharge permits issued by the Department must specify conditions requiring application of AKART to discharges to waters of the State (WAC 173-216-110). The following permit limitation is, at a minimum, necessary to satisfy the requirement for AKART:
Effluent in the evaporation ponds is restricted by the permit to a maximum depth of five feet (sixty inches).

GROUND WATER QUALITY-BASED EFFLUENT LIMITATIONS

In order to protect existing water quality and preserve the designated beneficial uses of Washington's ground waters including the protection of human health, WAC 173-200-100 states that waste discharge permits shall be conditioned in such a manner as to authorize only activities that will not cause violations of the Ground Water Quality Standards. Drinking water is the

beneficial use generally requiring the highest quality of ground water. Providing protection to the level of drinking water standards will protect a great variety of existing and future beneficial uses.

Applicable ground water criteria as defined in Chapter 173-200 WAC and in RCW 90.48.520 for this discharge include the following:

Table 3: Ground Water Quality Criteria

Parameter	Quantity
Total Coliform Bacteria	1 Colony/ 100 mL
Total Dissolved Solids	500 mg/L
Chloride	250 mg/L
Sulfate	250 mg/L
Nitrate	10 mg/L
pH	6.5 to 8.5 standard units
Manganese	0.05 mg/L
Total Iron	0.3 mg/L
Toxics	No toxics in toxic amounts

The Department has reviewed existing records and is unable to determine if background ground water quality is either higher or lower than the criteria given in Chapter 173-200 WAC.

Pollutant concentrations in the potential discharge exceed ground water quality criteria for pH and total dissolved solids. In addition, nitrogen, as represented in the TKN concentration as given in Table 1, far exceeds the ground water criteria of 10 mg/L for nitrate. The Department assumes that TKN will substantially convert to nitrate. Also, the extreme BOD₅ concentrations of 22,004 mg/L, if released to the ground water would create anaerobic conditions that would solubilize iron and manganese, which are subject to regulation under the ground water quality standards as shown in Table 3.

Single lined evaporation ponds without an effective leak detection system present the potential for ground water pollution. The Department has determined the facility's wastewater has a potential to pollute the ground water. The permit makes no allowance for any discharge of wastewater to ground water in exceedance of the criteria given in Table 3. The permit requires the submittal of an Engineering Report (S8) that develops the permittee's plans to insure protection of ground water quality. See the Engineering Report section of this fact sheet for further discussion on this submittal.

MONITORING REQUIREMENTS

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, that ground water criteria are not violated, and that effluent limitations are being achieved (WAC 173-216-110).

WASTEWATER MONITORING

The monitoring schedule is detailed in the proposed permit under Special Condition S2. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, significance of pollutants, and cost of monitoring.

OTHER PERMIT CONDITIONS

REPORTING AND RECORDKEEPING

The requirements of Special Condition S3. are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges (WAC 273-216-110).

ENGINEERING REPORT

The permit requires the submittal of an approvable Engineering Report (S8). The report shall provide a facility specific examination of the pollutants present in the process wastewater. The report shall also detail plans to assure protection of ground water quality.

An analysis of the evaporation ponds' design criteria is a necessary component of the Engineering Report. The analysis prepared by SCM Consultants, Inc., entitled: Analysis of expected depth of wastewater in ponds using estimated winery flows with rainfall added and evaporation removed assuming staged filling of the ponds starting in August 2001, presents the presumed evaporative capacity of the treatment ponds. Partial results of this analysis are given below in Table 4. However, this analysis is not an approved Engineering Report for the evaporation ponds.

Table 4: Evaporation Pond Loading

Month / Year	Process Flow (cubic feet)	Cumulative Estimated Depth (feet) of Pools
October 2003	363,682	3.99
November 2003	126,246	4.20

Month / Year	Process Flow (cubic feet)	Cumulative Estimated Depth (feet) of Pools
December 2003	32,430	4.15
January 2004	28,956	4.29
February 2004	44,013	4.60
March 2004	67,177	5.01
April 2004	49,804	5.13
May 2004	67,177	5.24
June 2004	89,183	5.20
July 2004	54,437	4.63
August 2004	88,025	3.98

Under the authority of WAC 173-240-110, the permit requires an Engineering Report (S8) be submitted to the Department that will present, at a minimum:

1. Specify plans for the reduction and treatment of pollutants in the Permittee's wastewater;
2. The new evaporation ponds' design criteria;
3. A plan to decommission or reconfigure the original unlined evaporation basin located north of Hanks Rd.

OPERATIONS AND MAINTENANCE

This permit contains Special Condition S5. as authorized under RCW 90.48.110, WAC 173-220-150, Chapter 173-230 WAC, and WAC 173-240-080. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture and treatment.

SOLID WASTE PLAN

The Department has determined that the Permittee has a potential to cause pollution of the waters of the State from leachate of solid waste.

This permit requires, under authority of RCW 90.48.080, that the Permittee develop and submit to the Department a Solid Waste Plan (S6.C) to prevent solid waste from causing pollution of waters of the State. The plan must also be submitted to the local solid waste permitting agency for approval, if required by local ordinance. The permit also requires the submittal of a Solid Waste Plan update one year prior to the permit's expiration.

SPILL PLAN

The Department has determined that the Permittee stores a quantity of chemicals that have the potential to cause water pollution if accidentally released. The Department has the authority to require the Permittee to develop best management plans to prevent this accidental release under section 402(a)(1) of the Federal Water Pollution Control Act (FWPCA) and RCW 90.48.080.

This permit requires the Permittee to develop and implement a plan for preventing the accidental release of pollutants to State waters and for minimizing damages if such a spill occurs.

GENERAL CONDITIONS

General Conditions are based directly on State laws and regulations and have been standardized for all industrial waste discharge to ground water permits issued by the Department.

Condition G1. requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2. requires the Permittee to allow the Department to access the treatment system, production facility, and records related to this permit. Condition G3. specifies conditions for modifying, suspending or terminating this permit. Condition G4. requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5. requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6. prohibits the Permittee from using the permit as a basis for violating any laws, statutes or regulations. Conditions G7. and G8. relate to permit renewal and transfer. Condition G9. requires the payment of permit fees. Condition G10. describes the penalties for violating permit conditions.

RECOMMENDATION FOR PERMIT ISSUANCE

This permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics, and to protect human health and the beneficial uses of waters of the State of Washington. The Department proposes that the permit be issued for five years.

REFERENCES FOR TEXT AND APPENDICES

Faulkner, S.P., Patrick Jr., W.H., Gambrell, R.P., May-June, 1989. Field Techniques for Measuring Wetland Soil Parameters, Soil Science Society of America Journal, Vol. 53, No.3.
Washington State Department of Ecology, 1993. Guidelines for Preparation of Engineering Reports for Industrial Wastewater Land Application Systems, Ecology Publication # 93-36. 20 pp.

Washington State Department of Ecology, 1996. Implementation Guidance for the Ground Water Quality Standards, Publication 96-02.

Washington State University, November, 1981. Laboratory Procedures - Soil Testing Laboratory. 38 pp.

APPENDIX A -- PUBLIC INVOLVEMENT INFORMATION

The Department has tentatively determined to reissue a permit to the applicant listed on page 1 of this fact sheet. The permit contains conditions and effluent limitations which are described in the rest of this fact sheet.

The Department published a Public Notice of Application and Draft (PNOA/D) on May 21, and May 28, 2003 in the Grandview Herald to inform the public that an application, draft permit and fact sheet were available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Water Quality Permit Coordinator
Department of Ecology
Central Regional Office
15 West Yakima Avenue, Suite 200
Yakima, WA 98902

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the thirty (30) day comment period to the address above. The request for a hearing shall indicate the interest of the party and reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-216-100). Public notice regarding any hearing will be circulated at least thirty (30) days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing.

The Department will consider all comments received within thirty (30) days from the date of public notice of draft indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone, 509/457-7105, or by writing to the address listed above.

This permit was written by Jim Leier.

APPENDIX B -- GLOSSARY

Ambient Water Quality--The existing environmental condition of the water in a receiving water body.

Ammonia--Ammonia is produced by the breakdown of nitrogenous materials in wastewater. Ammonia is toxic to aquatic organisms, exerts an oxygen demand, and contributes to eutrophication. It also increases the amount of chlorine needed to disinfect wastewater.

Average Monthly Discharge Limitation--The average of the measured values obtained over a calendar month's time.

Best Management Practices (BMPs)--Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the State. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

BOD₅--Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD₅ is used in modeling to measure the reduction of dissolved oxygen in a receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the Federal Clean Water Act.

Bypass--The intentional diversion of waste streams from any portion of the collection or treatment facility.

Compliance Inspection - Without Sampling--A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance Inspection - With Sampling--A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

Composite Sample--A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be "time-composite" (collected at constant time intervals) or "flow-proportional" (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots).

Construction Activity--Clearing, grading, excavation and any other activity which disturbs the surface of the land. Such activities may include road building, construction of residential houses, office buildings, or industrial buildings, and demolition activity.

Distribution Uniformity--The uniformity of infiltration (or application in the case of sprinkle

or trickle irrigation) throughout the field expressed as a percent relating to the average depth infiltrated in the lowest one-quarter of the area to the average depth of water infiltrated.

Engineering Report--A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

Grab Sample--A single sample or measurement taken at a specific time or over as short period of time as is feasible.

Industrial Wastewater--Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business, from the development of any natural resource, or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

Maximum Daily Discharge Limitation--The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

Method Detection Level (MDL)--The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is above zero and is determined from analysis of a sample in a given matrix containing the analyte.

pH--The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

Quantitation Level (QL)--A calculated value five times the MDL (method detection level).

Soil Scientist--An individual who is registered as a Certified or Registered Professional Soil Scientist or as a Certified Professional Soil Specialist by the American Registry of Certified Professionals in Agronomy, Crops, and Soils or by the National Society of Consulting Scientists or who has the credentials for membership. Minimum requirements for eligibility are: possession of a baccalaureate, masters, or doctorate degree from a U.S. or Canadian institution with a minimum of 30 semester hours or 45 quarter hours professional core courses in agronomy, crops or soils, and have 5, 3, or 1 years, respectively, of professional experience working in the area of agronomy, crops, or soils.

State Waters--Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the State of Washington.

Stormwater--That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body, or a constructed infiltration facility.

Technology-based Effluent Limit--A permit limit that is based on the ability of a treatment method to reduce the pollutant.

Total Coliform Bacteria--A microbiological test which detects and enumerates the total coliform group of bacteria in water samples.

Total Dissolved Solids--That portion of total solids in water or wastewater that passes through a specific filter.

Total Suspended Solids (TSS)--Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

Water Quality-based Effluent Limit--A limit on the concentration of an effluent parameter that is intended to prevent pollution of the receiving water.

APPENDIX C -- RESPONSE TO COMMENTS

Addendum – Coventry Vale Winery’s Comments to the permit and fact sheet and the Department of Ecology’s response to comments.

The following comments were received by the Department on June 12, 2003:

I. COMMENTS ON DRAFT PERMIT AND FACT SHEET

Coventry Vale’s Comment:

The Permittee commented on the Engineering Report required in the permit and clarified what the plans are for the original treatment pond north of Hank’s Road:

“The current plan is to convert the unlined pond to dual stilling basins. This configuration will allow the settling of most of the solids prior to entering the lift station to pump the effluent to the evaporation ponds. The removal of a considerable amount of both BOD and TSS are greatly enhanced in the stilling basin design. The dual stilling basins will allow for cleaning on basin while using the other. The elimination of most of the settleable solids will also delay and could eliminate the cleaning and maintenance operations required in the lined lagoons.”

DOE’s response:

The Department has noted the above comment and agrees with the concept of the stilling basins plan.

Coventry Vale’s Comment:

The Permittee commented on the wastewater monitoring stipulated in S2 of the permit:

The requirement set forth in the wastewater monitoring section stipulate grab sampling from both ponds 1 and 2. It would be our recommendation that composite testing be performed on samples from the lift station and grab samples be taken from the pond 1 (re-aeration pond). This is similar to the testing program used for the past eight (8) months and allows the evaluation of the effectiveness of the aeration system.

DOE’s response:

The Department has noted the above comment and agrees with revision to the monitoring plan in S2. The revision is reflected in the permit.

EXPIRATION DATE: JULY 31, 2008

Coventry Vale's Comment:

The Permittee clarified their plans for handling solid waste:

“Solid Waste Control Plan – The solid waste plan will include removal of solids collected in the stilling basins and from the lagoons. The plan will address disposal of the solids either at the vineyard or transported to a State approved landfill for disposal.”

DOE's response:

The Department has noted the above comment and agrees the stated plans for handling solid waste. This does not absolve the Permittee from submitting the Solid Waste Plan to the Department as required in S6.C of the permit.

Coventry Vale's Comment:

The Permittee commented on the permit's requirement for a spill plan (S7):

“Spill Plan – It is possible that some small amounts of chemicals will be stored at the stilling basins to either mitigate odors or improve settling of solids. If so, a spill plan for these chemicals will be developed. No chemicals will be stored as part of the wastewater lagoon treatment process and no spill plan should be required.”

DOE's response:

The permit will retain the requirement for a Spill Prevention and Control Plan as given in S7. The Department's position is that pollution prevention is an integral part of the wastewater treatment process. Chemicals utilized in the Permittee's wine making process buildings, such as tank cleaning chemicals, need to be handled with care. The Spill Prevention and Control Plan shall provide plans and details to prevent contamination of the wastewater treatment system.